

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 08 CR 241
v.)	Hon. Blanche M. Manning
)	
JOSE EDUARDO SERRANO-ESPINOZA)	
ROGELIO SOBERANIS)	
ROSALIO SOBERANIS)	
MARIANO LOPEZ)	
ROBERTO CARLOS SILVA LOPEZ)	
HECTOR URBINA)	
REUBEN ROMO)	

**GOVERNMENT'S MOTION TO MODIFY CONDITIONS OF BOND
FOR DEFENDANT REUBEN ROMO**

The UNITED STATES OF AMERICA, by its attorney, PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, hereby moves to modify the conditions of bond of defendant Reuben Romo ("Romo"), in accordance with that recommended by Pretrial Services.

In support of this motion, the government states as follows:

1. Bond: Defendant Romo was released on bond on March 25, 2008, with certain conditions, including a curfew.
2. Violation of Bond: On August 5, 2008, Pretrial Services filed a report documenting that defendant violated his conditions of bond. Specifically, the Pretrial Services Officer ("PSO") documented that, pursuant to a curfew check on July 30, 2008, the PSO discovered that Romo's telephone service had been disconnected. On July 31, 2008, Romo reported to the PSO that his telephone service had been disconnected due to non-payment, and that he had signed for service with another carrier, but that service would not be available to his residence for another 3-4 days.

On August 4, Romo represented to the PSO that telephone service would be available at his residence on August 6. As of the date of the Pretrial Services Report, which appears to be August 5, Romo had no telephone service. In addition, Romo reported that he no longer was employed at Swedish Covenant Hospital, as he was at the time that bond was set.

3. Recommendation to Modify Bond: The PSO recommended that Romo's bond be modified to include the condition of curfew with electronic monitoring.

CONCLUSION

For the reasons set forth above, the government respectfully requests that this Court modify the conditions of Romo's bond in accordance with the recommendation of Pretrial Services.

Respectfully submitted,

ss// Sheri H. Mecklenburg

SHERI H. MECKLENBURG

Assistant U.S. Attorneys

U.S. Attorney's Office

219 S. Dearborn Street

Chicago, Illinois 60604

(312) 469-6030

CERTIFICATE OF SERVICE

The undersigned Assistant United States Attorney hereby certifies that the

**GOVERNMENT'S MOTION TO MODIFY CONDITIONS OF BOND
FOR DEFENDANT REUBEN ROMO**

was served on August 12, 2008, in accordance with Fed. R. Crim. P. 49 and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers and, further, on the same date, a copy of such motion was hand-delivered to:

Pretrial Services
219 S. Dearborn, 15th Floor,
Chicago, IL
Attn: Victor Alvarez.

s/ Sheri H. Mecklenburg
Sheri H. Mecklenburg
Assistant United States Attorney
(312) 469-6030